

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

In re:) Chapter 11 Case No. 20-10049-TPA
)
TRI-STATE PAIN INSTITUTE, LLC,) Related to Doc. No. 785
Debtor)
)

In re:) Chapter 11 Case No. 20-10334-TPA
)
JOSEPH M. THOMAS, M.D.,) Related to Doc. No. 537
Debtor)
)

STIPULATION AND CONSENT ORDER

AND NOW, this 22 day of December, 2021, comes Quinn, Buseck, Leemhuis, Toohey, & Kroto, Inc., (“Quinn Law”), Marsh Spaeder Baur Spaeder & Schaaf, LLP (“Marsh Spaeder”), MacDonald Illig Jones & Britton, LLP (“MIJB”), and Knox McLaughlin Gornall & Sennett, P.C. (“Knox Law”) (together referred to as the “Estate Professionals”), and Wells Fargo Bank National Association, by and through their undersigned counsel, and file this Stipulation and Consent Order (the “Stipulation”), as follows:

WHEREAS, pursuant to Paragraph 5.2 of the Joint Amended Chapter 11 Plan of Reorganization dated October 7, 2021 (the “Plan”) [Doc. No. 769 in Case No. 21-10049], \$100,000 is earmarked for distribution to administrative professionals;

WHEREAS, the Debtor agrees to make said distribution now from the funds currently on-hand;

WHEREAS, upon consideration of the allowed and pending fee applications, it appearing that there is \$100,000.00 of funds that are available for distribution now to the Estate Professionals in these Cases;

WHEREAS, after said \$100,000 is paid out, sufficient funds will remain in escrow for the Debtor to fulfill its other cash obligations on the Effective Date, including but not limited to the \$400,000 earmarked for payment to Wells Fargo Bank, N.A.;

Therefore, it is ORDERED that \$100,000.00 shall be paid forthwith to the Estate Professionals on account, as follows:

PAYEE	PERCENT OF AVAILABLE CASH	AMOUNT TO BE PAID
Michael P. Kruszewski, Esquire Quinn Law Firm	30%	\$29,879.10
Gary V. Skiba, Esquire Marsh Schaaf, LLP	27%	\$27,317.21
Guy C. Fustine, Esquire Knox McLaughlin Gornall & Sennett, P.C.	31%	\$30,810.80
Gary Eiben, Esquire MacDonald Illig Jones & Britton LLP	12%	\$11,992.89

Dated: _____

Thomas P. Agresti, Judge
United States Bankruptcy Court

STIPULATED TO BY:

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/s/ Guy C. Fustine

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By: /s/ Salene Mazur Kraemer

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